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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, ) No. CR 20-70698 JCS  
Plaintiff, )  
v. ) STIPULATION AND [PROPOSED] ORDER  
SANDRA ANN ZUNIGA, ) WAIVING TIME UNDER SPEEDY TRIAL ACT  
Defendant. ) AND RULE 5.1  
 )  
 )  
 )

With the agreement of the parties, and with the consent of the defendant, the Court enters this order continuing the preliminary hearing date of August 20, 2020, at 9:30 a.m., to September 24, 2020, at 9:30 a.m. and documenting the defendant's waiver of the preliminary hearing date under Federal Rule of Criminal Procedure 5.1 and the exclusion of time under the Speedy Trial Act, 18 U.S.C. 3161(b).

The parties agree, and the Court finds and holds, as follows:

1. The defendant is currently charged by criminal complaint. The defendant is not in custody, having been released on an unsecured bond of \$250,000 on June 10, 2020.

2. The defendant agrees to an exclusion of time under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A) & (B)(iv) to provide reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

3. The defendant waives the time limits of Federal Rule of Criminal Procedure 5.1 for preliminary hearing.

4. Counsel for the defense believes that postponing the preliminary hearing is in her client's best interest, and that it is not in her client's interest for the United States to indict the case during the timeline established in Rule 5.1.

5. The Court finds that, taking into the account the public interest in the prompt disposition of criminal cases, these grounds are good cause for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1. Given these circumstances, the Court finds that the ends of justice served by excluding the period from August 20, 2020 through September 24, 2020, outweigh the best interest of the public and the defendant in a speedy trial. 18 U.S.C. 3161(h)(7)(A).

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6. Accordingly, and with the consent of the defendant, the Court (1) continues the preliminary hearing date of August 20, 2020, at 9:30 a.m. to September 24, 2020, before the Honorable Laurel Beeler, and (2) orders that the period from August 20, 2020, through September 24, 2020 be excluded from the time period for preliminary hearings under Federal Rule of Criminal Procedure 5.1 and from Speedy Trial calculations under 18 U.S.C. 3161(h)(7)(A) & (B)(iv).

## IT IS SO STIPULATED:

DATED: August 18, 2020

/s/

DATED: August 18, 2020

/s/  
ALEXANDRA SHEPARD  
Special Assistant United States Attorney

IT IS SO ORDERED.

DATED: August 18, 2020

HON. LAUREL BEELER  
United States Magistrate Judge